

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-00036-RWS
JURY TRIAL DEMANDED

**DECLARATION OF SAQIB J. SIDDIQUI IN SUPPORT OF
MAXELL, LTD.'S MOTION TO AMEND THE PROTECTIVE ORDER**

I, Saqib J. Siddiqui, hereby declare and state as follows:

1. I am an Associate at Mayer Brown LLP and counsel for Plaintiff Maxell, Ltd. ("Maxell") in the above-captioned case and have personal knowledge with respect to the asserted patents and accused functionalities in the German Proceedings between Maxell and Apple.

2. The functionalities accused by Maxell in the German Proceedings include at least FaceTime, position calculation, AirDrop, WiFi and Bluetooth communications in iOS devices.

3. At least FaceTime, position calculation, AirDrop, and WiFi and Bluetooth communications between iOS devices have also been accused in the above-captioned case. *See e.g.*, Complaint (Dkt. No 1) at ¶ 24 (position calculation); ¶¶ 66 and 139 (AirDrop and WiFi and Bluetooth communications); and ¶ 96 (FaceTime).

I declare under penalty of perjury that the above is true and correct and that this Declaration was executed on October 2, 2020 in Great Falls, Virginia.



Dated: October 2, 2020

By: _____

Saqib J. Siddiqui